

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

<hr/>		X
CITY OF PROVIDENCE, RHODE ISLAND,	:	Civil Action No. 1:14-cv-02811-JMF
Individually and on Behalf of All Others	:	
Similarly Situated,	:	<u>CLASS ACTION</u>
	:	
Plaintiff,	:	
	:	
vs.	:	
	:	
BATS GLOBAL MARKETS, INC., et al.,	:	
	:	
Defendants.	:	
<hr/>		
AMERICAN EUROPEAN INSURANCE	:	Civil Action No. 1:14-cv-03133-JMF
COMPANY, Individually and on Behalf of All	:	
Others Similarly Situated,	:	<u>CLASS ACTION</u>
	:	
Plaintiff,	:	
	:	
vs.	:	
	:	
BATS GLOBAL MARKETS, INC., et al.,	:	
	:	
Defendants.	:	
<hr/>		X

[Caption continued on following page.]

THE INSTITUTIONAL INVESTORS’ NOTICE OF MOTION AND MOTION FOR
CONSOLIDATION, APPOINTMENT AS LEAD PLAINTIFF AND APPROVAL OF
SELECTION OF COUNSEL

<hr/>	X	
HAREL INSURANCE CO, LTD., Individually :	:	Civil Action No. 1:14-cv-03608-JMF
and on Behalf of All Others Similarly Situated, :	:	
	:	<u>CLASS ACTION</u>
Plaintiff,	:	
	:	
vs.	:	
	:	
BATS GLOBAL MARKETS, INC., et al.,	:	
	:	
Defendants.	:	
	:	
	:	
<hr/>	X	
JAMES J. FLYNN and DOMINIC A. :	:	Civil Action No. 1:14-cv-04321-UA
MORELLI, Individually and on Behalf of All :	:	
Others Similarly Situated,	:	<u>CLASS ACTION</u>
	:	
Plaintiff,	:	
	:	
vs.	:	
	:	
BANK OF AMERICA CORPORATION, et :	:	
al.,	:	
	:	
Defendants.	:	
<hr/>	:	

TO: ALL PARTIES AND THEIR COUNSEL OF RECORD

PLEASE TAKE NOTICE that on July 9, 2014 at 3:30 p.m., or as soon thereafter as the matter may be heard, in the Courtroom of the Honorable Jesse M. Furman, Courtroom 1105 of the Thurgood Marshall United States Courthouse, 40 Foley Square, New York, NY, City of Providence, Rhode Island, Plumbers and Pipefitters National Pension Fund, Employees' Retirement System of the Government of the Virgin Islands, State-Boston Retirement System, and Första AP-fonden (collectively, the "Institutional Investors") will, and hereby do, move this Court pursuant to §21D(a)(3)(B) of the Securities Exchange Act of 1934, 15 U.S.C. §78u-4(a)(3)(B), for an order: (1) consolidating the above-captioned actions pursuant to Rule 42(a) of the Federal Rules of Civil Procedure; (2) appointing the Institutional Investors as lead plaintiff pursuant to the Private Securities Litigation Reform Act of 1995; (3) approving the Institutional Investors' selection of Robbins Geller Rudman & Dowd LLP, Motley Rice LLC and Labaton Sucharow LLP as lead counsel for the proposed class; and (4) granting such other and further relief as the Court may deem just and proper.

This Motion is based on this Notice of Motion, the Memorandum of Law in support thereof, the Declaration of Patrick J. Coughlin in support thereof, a proposed order, the pleadings and files herein, and such other written or oral argument as may be presented to the Court.

DATED: June 17, 2014

ROBBINS GELLER RUDMAN
& DOWD LLP
PATRICK J. COUGHLIN
RANDI BANDMAN

s/ Patrick J. Coughlin
PATRICK J. COUGHLIN

30 Vesey Street, Suite 200
New York, NY 10007
Telephone: 212/693-1058
patc@rgrdlaw.com
randib@rgrdlaw.com

ROBBINS GELLER RUDMAN
& DOWD LLP
SAMUEL H. RUDMAN
VINCENT M. SERRA
58 South Service Road, Suite 200
Melville, NY 11747
Telephone: 631/367-7100
631/367-1173 (fax)
srudman@rgrdlaw.com
vserra@rgrdlaw.com

ROBBINS GELLER RUDMAN
& DOWD LLP
ANDREW J. BROWN
DAVID W. MITCHELL
BRIAN O. O'MARA
LONNIE A. BROWNE
600 West Broadway
San Diego, CA 92101
Telephone: 619/231-1058
619/231-7423 (fax)
andrewb@rgrdlaw.com
davidm@rgrdalw.com
bomara@rgrdlaw.com
lbrowne@rgrdlaw.com

MOTLEY RICE LLC
JOSEPH F. RICE
WILLIAM H. NARWOLD
ANN K. RITTER
DAVID P. ABEL
28 Bridgeside Blvd.
Mount Pleasant, SC 29464
Telephone: 843/216-9000
843/216-9450 (fax)
jrice@motleyrice.com
bnarwold@motleyrice.com
aritter@motleyrice.com
dabel@motleyrice.com

MOTLEY RICE LLC
DONALD A. MIGLIORI
REBECCA KATZ
600 Third Avenue, Suite 2101
New York, NY 10016
Telephone: 212/577-0040
212/577-0054 (fax)
dmigliori@motleyrice.com
rkatz@motleyrice.com

LABATON SUCHAROW LLP
CHRISTOPHER J. KELLER
JOEL H. BERNSTEIN
MICHAEL W. STOCKER
140 Broadway
New York, New York 10005
Telephone: (212) 907-0700
Facsimile: (212) 818-0477
ckeller@labaton.com
jbernstein@labaton.com
mstocker@labaton.com

[Proposed] Co-Lead Counsel for Plaintiffs

O'DONOGHUE & O'DONOGHUE LLP
LOUIS P. MALONE
4748 Wisconsin Avenue, N.W.
Washington, DC 20016
Telephone: 202/362-0041
202/362-2640 (fax)

Additional Counsel for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on June 17, 2014, I authorized the electronic filing of the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-mail addresses denoted on the attached Electronic Mail Notice List, and I hereby certify that I caused to be mailed the foregoing document or paper via the United States Postal Service to the non-CM/ECF participants indicated on the attached Manual Notice List.

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on June 17, 2014.

s/ Patrick J. Coughlin

PATRICK J. COUGHLIN

ROBBINS GELLER RUDMAN
& DOWD LLP

30 Vesey Street, Suite 200

New York, NY 10007

Telephone: 212/693-1058

E-mail: patc@rgrdlaw.com

Mailing Information for a Case 1:14-cv-02811-JMF

Electronic Mail Notice List

The following are those who are currently on the list to receive e-mail notices for this case.

- **Randi Dawn Bandman**
randib@rgrdlaw.com
- **Stephen P Bedell**
sbedell@foley.com
- **Jeremy A. Berman**
jberman@skadden.com
- **Julia Marie Beskin**
juliabeskin@quinnemanuel.com
- **David Charles Bohan**
david.bohan@kattenlaw.com,ecfdocket@kattenlaw.com,bridget.diedrich@kattenlaw.com
- **Sara B. Brody**
sbrody@sidley.com,rfant@sidley.com,dspenner@sidley.com,tnewman@sidley.com,rbmartin@sidley.com
- **Andrew J. Brown**
andrewb@rgrdlaw.com,nhorstman@rgrdlaw.com,kirstenb@rgrdlaw.com,ldeem@rgrdlaw.com
- **Thomas Bundy**
thomas.bundy@sutherland.com
- **Richard W Clary**
rclary@cravath.com
- **Patrick Joseph Coughlin**
patc@rgrdlaw.com
- **Douglas Randall Cox**
dcox@gibsondunn.com,aarias@gibsondunn.com,smartin@gibsondunn.com
- **Agnes Dunogue**
Agnes.Dunogue@Shearman.com
- **Angus White Dwyer**
adwyer@spencerfane.com,pozias@spencerfane.com,lvile@spencerfane.com
- **Jamie Stephen Dycus**
jamie.dycus@wilmerhale.com
- **Joe Wesley Earnhardt**
wearnhardt@cravath.com
- **Scott Alexander Edelman**
sedelman@milbank.com
- **Stephen Ehrenberg**

- **Jonathan Neil Eisenberg**
jon.eisenberg@klgates.com
- **Peter Nicholas Flocos**
peter.flocos@klgates.com
- **Brian Lawrence Friedman**
blfriedman@proskauer.com,LSOSDNY@proskauer.com
- **Harry Frischer**
hfrischer@proskauer.com,LSOSDNY@proskauer.com
- **James Loyd Gattis**
lgattis@spencerfane.com,kholm@spencerfane.com
- **Faith E. Gay**
faithgay@quinnemanuel.com
- **Charles Alan Gilman**
cgilman@cahill.com,mmcloughlin@cahill.com,nmarcantonio@cahill.com
- **Robert Joseph Giuffra , Jr**
giuffrar@sullcrom.com,s&cmanagingclerk@sullcrom.com
- **Andrew Garry Gordon**
agordon@paulweiss.com
- **Marc Laurence Greenwald**
marcgreenwald@quinnemanuel.com
- **Adam Selim Hakki**
ahakki@shearman.com
- **Stacie Rachel Hartman**
shartman@schiffhardin.com,edocket@schiffhardin.com
- **Fraser Lee Hunter , Jr**
fraser.hunter@wilmerhale.com,whmao@wilmerhale.com
- **David George Januszewski**
djanuszewski@cahill.com
- **Alex Jason Kaplan**
ajkaplan@sidley.com,nyefiling@sidley.com
- **Arnold Richard Kaplan**
akaplan@spencerfane.com
- **Jay B. Kasner**
jkasner@skadden.com
- **Ankush Khardori**
akhardori@paulweiss.com

- **Daniel Jonathan Kramer**
dkramer@paulweiss.com
- **Thomas Paul Krebs**
tkrebs@foley.com
- **Mark D. Lanpher**
mark.lanpher@shearman.com
- **Matthew Joseph Laroche**
mlaroche@milbank.com
- **David Sapir Lesser**
david.lessner@wilmer.com,whmao@wilmerhale.com,lessnerda@yahoo.com
- **Seth L. Levine**
slevine@levinelee.com
- **Lewis J. Liman**
lliman@cgsh.com,maofiling@cgsh.com
- **Joseph C. Lombard**
jlombard@mmlawus.com
- **Mitchell A. Lowenthal**
maofiling@cgsh.com,mloenthal@cgsh.com
- **Jackie Adeline Lu**
jlu@sidley.com,nyefiling@sidley.com
- **Mark S. Mandel**
mmandel@foley.com,tkrebs@foley.com,sbedell@foley.com
- **Alexander Virgil Maugeri**
amaugeri@cravath.com
- **David W. Mitchell**
davidm@csgrr.com,slandry@rgrdlaw.com
- **James Alwin Murphy**
jmurphy@mmlawus.com
- **Scott D. Musoff**
smusoff@skadden.com,david.carney@skadden.com
- **Brian O. O'Mara**
bomara@rgrdlaw.com,e_file_sd@rgrdlaw.com
- **Stuart Harris Pack**
spack@spencerfane.com,lgarofalo@spencerfane.com
- **Dean N. Panos**
dpanos@jenner.com
- **Christos Papapetrou**
cpapapetrou@levinelee.com

- **Alfred Robert Pietrzak**
rpietrzak@sidley.com,nyefiling@sidley.com
- **Stephen Leonard Ratner**
sratner@proskauer.com,LSOSDNY@proskauer.com
- **William Michael Regan**
william.regan@kattenlaw.com,wregan@kattenlaw.com
- **Daniel Alexander Richards**
drichards@cravath.com
- **Samuel Howard Rudman**
srudman@rgrdlaw.com,e_file_ny@rgrdlaw.com,mblasy@rgrdlaw.com,e_file_sd@rgrdlaw.com
- **Holly H. Smith**
holly.smith@sutherland.com,april.pearce@sutherland.com
- **Theodore R. Snyder**
Theodore.Snyder@mmlawus.com
- **Dorothy Jane Spenner**
dspenner@sidley.com,nyefiling@sidley.com
- **Howard Steven Suskin**
hsuskin@jenner.com
- **John Andrew Valentine**
john.valentine@wilmerhale.com
- **Thomas Charles White**
whitet@sullcrom.com,s&cmanagingclerk@sullcrom.com
- **Richard Corey Worcester**
coreyworchester@quinnemanuel.com
- **Allison Michele Wuertz**
allison.wuertz@kattenlaw.com
- **Boris Zeldin**
bzeldin@proskauer.com,LSOSDNY@proskauer.com

Manual Notice List

The following is the list of attorneys who are **not** on the list to receive e-mail notices for this case (who therefore require manual noticing). You may wish to use your mouse to select and copy this list into your word processing program in order to create notices or labels for these recipients.

- (No manual recipients)